

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	:	<b>CHAPTER 13</b>
	:	
<b>ARON GUTTIN</b>	:	<b>NO. 17-17469 MDC</b>

**CERTIFICATION OF COUNSEL OF DEFAULT FROM STIPULATION  
BETWEEN DEBTOR AND RIVERS BEND III CONDOMINIUM ASSOCIATION  
AND REQUEST FOR RELIEF FROM THE STAY**

I, Elliot H. Berton, Esquire, certify as follows:

1. I am an associate in the law firm of Steven L. Sugarman & Associates, counsel to Rivers Bend III Condominium Association (the "Association") in the above-captioned case.
2. On May 14, 2019, the Honorable Magdeline E. Coleman entered an Order approving a Stipulation Between the Debtor and the Association Resolving the Association's Motion for Relief from the Automatic Stay (the "Stipulation"). A true and correct copy of the Order and Stipulation are collectively attached hereto and incorporated herein as Exhibit "A."
3. On December 9, 2021, I issued correspondence to the Debtor, with a copy to Debtor's counsel, notifying Debtor that he was in default from the terms of the Stipulation for failure to remit required payments to the Association. A true and correct copy of the letter is attached hereto and incorporated herein as Exhibit "B."
4. Notwithstanding the attached letter, Debtor has not remitted payments to the Association as required by the Stipulation.
5. Consistent with paragraph 6 of the Stipulation, upon submission of this Certification of Counsel, the Association is entitled to entry of an Order granting the Association relief from the automatic stay pursuant to 11 U.S.C. §362(a) concerning the Unit known as and located at 9584 B State Road, Philadelphia, Pennsylvania 19114.

The foregoing statements are true and correct to the best of my personal knowledge, information and belief. I am aware that if any statement made herein is willfully false, I am subject to punishment.

STEVEN L. SUGARMAN & ASSOCIATES

December 22, 2021

Date

By: /s/ Elliot H. Berton, Esquire

Elliot H. Berton, Esquire

Attorneys for Rivers Bend III Condominium Association